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October 15, 2021

Via ECF

The Honorable Naomi Reice Buchwald,
United States District Judge,
Daniel Patrick Moynihan United States Courthouse,
500 Pearl Street,
New York, New York 10007-1312.

Re: *In re LIBOR-Based Financial Instruments Antitrust Litig.*,
No. 11-md-02262-NRB (S.D.N.Y.)

Dear Judge Buchwald:

Sullivan & Cromwell LLP is counsel to Defendants Barclays PLC, Barclays Bank PLC, Barclays Capital Inc., and MUFG Bank, Ltd. (f/k/a The Bank of Tokyo-Mitsubishi UFJ, Ltd.) in the above-referenced multi-district litigation pending before Your Honor (the “USD LIBOR MDL”).

Dylan M. Aluisse, one of your former law clerks, will join Sullivan & Cromwell LLP on October 18, 2021, as an associate in the firm’s New York office. We are writing to Your Honor pursuant to New York Rule of Professional Conduct 1.12, which (i) bars a former law clerk from representing a client in connection with a matter in which he or she participated personally and substantially while clerking, and (ii) describes notification and screening requirements that must be put in place to ensure that the former law clerk does not share information regarding the matter with others at the firm. This letter sets out Sullivan & Cromwell LLP’s compliance with the requirements of Rule 1.12.

1. Sullivan & Cromwell LLP has taken the following steps to screen Mr. Aluisse from the USD LIBOR MDL:

- a. Our partner Joseph Neuhaus has notified Mr. Aluisse in writing that he is not to participate in the USD LIBOR MDL, discuss it with lawyers or nonlawyer personnel working on it, or review any documents relating to it.

The Honorable Naomi Reice Buchwald

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- b. Mr. Neuhaus has notified in writing all lawyers, legal analysts, legal assistants and lawyers' secretaries that they are not to discuss the USD LIBOR MDL with Mr. Aluisse or allow him access to documents concerning it.
- c. Mr. Neuhaus has sent a memorandum to the firm's Records Department instructing it not to allow Mr. Aluisse to have access to any files relating to the USD LIBOR MDL. This triggers restrictions on Mr. Aluisse's access to electronic documents relating to that litigation.

2. As Mr. Aluisse is a salaried employee, he will not share in any fees attributable to Sullivan & Cromwell LLP's work on the USD LIBOR MDL.

If the Court requires any additional information concerning this matter, please let us know, and we will be happy to provide it.

Respectfully submitted,

/s/ Jeffrey T. Scott

*Counsel to Defendants Barclays PLC,
Barclays Bank PLC, and Barclays
Capital Inc.*

/s/ Christopher M. Viapiano

*Counsel to Defendant MUFG Bank, Ltd.
(f/k/a The Bank of Tokyo-Mitsubishi
UFJ, Ltd.)*

cc: All Counsel of Record (via ECF)